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Ramón Coto Ojeda, Esq. (USDC-PR 202006)

Proposed Attorney for creditor Payco Foods Corporation

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, et al.,

Debtors1.

Chapter 11

Case No. 18-23538 (RDD) (Jointly Administered)

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE

I, Ramón Coto Ojeda, a member in good standing of the bars of the Commonwealth of Puerto Rico, and the United States District

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365) (collectively, the "Debtors"). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Court for the District of Puerto Rico, among other courts, hereby request admission, pro hac vice, before the Honorable Robert D. Drain, to represent Payco Foods Corporation, a domestic corporation organized under the laws of the Commonwealth of Puerto Rico, who is a creditor in connection with the Chapter 11 case filed by Sears, Roebuck de Puerto Rico, Inc., Case No. 18-23561(RDD)-which is jointly administered by the above referenced case-, and all related proceedings, pursuant to Local Bankruptcy Rule 2090-1(b) for the Southern District of New York, SD NY USBC LBR 2090-1(b).

Also, I have submitted the filing fee for \$200.00 with this motion for *pro hac vice* admission, by electronic payment with a credit card via the Case Management/Electronic Case Filing ("CM/ECF").

Dated: February 4, 2019
San Juan, Puerto Rico

s/Ramón Coto Ojeda

USDC-PR No. 202006

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